

REMARKS

Claims 24-30 and 48-56 are pending in the application.

Claim Rejections under 35 USC § 103

Claims 24-30, 48, 51, and 54 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bozich et. al. (US 6,748,285) (hereinafter, "Bozich"), in view of Irons (US 6,744,936). Claims 49-50, 52-53, and 55-56 stand rejected as unpatentable over Bozich in view of Irons, further in view of Serrano-Morales (2002/0049715).

According to the MPEP § 706.02(j), to meet the threshold showing of prima facie obviousness, the prior art references must teach or suggest all claimed limitations. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir 1991).

Examiner has not, respectfully, met the burden of establishing a prima facie case of obviousness for the rejected claims, because each pending claim includes features or limitations that are not taught or suggested by any reference or combination of references of record. Each rejection relies on the new Irons reference for teaching a type of label printing, but the label printing Irons teaches or suggests a most basic form of label printing (printing labels at a desktop label printer – discussed further *infra*), that cannot reasonably be said to teach or suggest what is actually present in applicant's pending claims.

Particularly, none of the references relied on in the current rejection include at least the following features or limitations:

Claims 24-26: "... wherein the label management system creates a label record associated with one of the business units, and selective prints a label at one of the manufacturing facilities based on the label record and the associated business units."

Claims 27-30: "... printing a label at one of the manufacturing facilities according to the selected label record and the associated business unit."

Claims 48-50: "... a plurality of software modules executing on computing devices coupled to the database, wherein the software modules present an interface by which authorized

users of the groups create label records, and selectively print the labels at the corresponding output location for the organizations.”

Claims 51-53: “... in response to input from the users, selectively printing labels at the corresponding output locations for the organizations.”

Claims 54-56: “... selectively print labels at the corresponding output locations for the organizations.”

There is a similarity to these limitation; for example some concern printing at a location or facility based on or according to something. It appears the Irons reference was brought into the rejection to account for these limitations, but the Irons reference falls short.

Irons concerns managing digital images of paper-based documents in a digital filing system. Irons mentions placing a label bearing a unique serial number directly on a document before the document is scanned into the digital filing system. When the document is scanned, the serial number on the label could be read by a computer, and thereby the electronic copy of the document and the physical copy of the document may be associated.

Irons teaches these document labels either be pre-printed (a roll of them, as one would have a roll of stamps, in FIG. 3D) and dispensed by a “desktop label dispenser” (col. 6 at 61 and also depicted in FIG. 1 as desktop label dispenser 202), or printed on a “desktop label printer” (col. 8 at 25). This latter method, that of desktop label printing, appears to be the only possibly relevant label printing disclosed in Irons.

Printing a label on a desktop label printer cannot be said to teach or suggest, e.g., selectively printing a label at a manufacturing facility based on the label record and associated business units (claim 24). For one, the printing of labels disclosed in Irons is a desktop label printer. There is no mention of the possibility of the label being printed at a different location (certainly not a manufacturing facility or else ware), and similarly no mention, thought, or suggestion of the printing being based on the label record and associated business units (again, claim 24). Further, Irons does not include the notion of a label record, and thus cannot teach or suggest that any label record be associated with a business unit. Rather, Irons teaches printing a unique number on a label. Applicant respectfully urges that to say Irons teaches or suggests the

limitations and features of Applicant's claims is to not give fair weight and consequence to the limitations of Applicant's claims.

The remaining claims similarly include similar limitations concerning label printing that are not taught or suggested by Irons (or the other references of record).

In summary, even given a liberal reading of the references cited against Applicant, the elements required in Applicants claims still have limitations and elements that are not taught or suggested by the references, either alone or in combination. For this reason at least, Applicant requests Examiner to withdraw her rejection under § 103(a) and advance claims to allowance.

Respectfully submitted,

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Date

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